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IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL COURT

PEOPLE OF THE STATE OF ILLINOIS,  
ex rel. THE DEPARTMENT OF PUBLIC  
HEALTH, STATE OF ILLINOIS,

Plaintiff,

vs.

SAUGET AND COMPANY  
2902 Monsanto Avenue  
Sauget, Illinois,

Defendant.

AT LAW

NO.

COMPLAINT

The Plaintiff, People of the State of Illinois, on the relation of the Department of Public Health, State of Illinois, by John M. Karns, Jr., State's Attorney, County of St. Clair, State of Illinois, its attorney, complaining of the defendant, Saugat and Company, for cause of action says:

1. The Plaintiff is a Department created by Section 3 of The Civil Administrative Code of Illinois. (Ch. 127, par. 3, Ill. Rev. Stat. 1967.)
2. Franklin D. Yoder, is the Director of the plaintiff, The Department of Public Health, State of Illinois, as provided by Section 4 of The Civil Administrative Code of the State of Illinois. (Ch. 127, par. 4, Ill. Rev. Stat. 1967.)
3. That at all times hereinafter mentioned there was in full force and effect "AN ACT in relation to the registration and regulation of refuse disposal sites and facilities and making an appropriation therefor." Amended and approved August 4, 1967, L. 1967, p. 1864, H.B. No. 391, (Sections 1 to 6 inclusive, Ch. 111 1/2, pars. 471 to 476 inclusive, Ill. Rev. Stat. 1967), a true copy of said Act is attached hereto, incorporated herein by reference, made a part hereof, designated as Exhibit "A", and hereinafter referred to as the "Refuse Disposal Act".
4. That at all times hereinafter mentioned there was in full force and effect certain rules and regulations for refuse disposal sites and facilities promulgated and adopted by the plaintiff department, a true copy of which is attached hereto, incorporated herein by reference, made a part hereof, and designated as



using, or permitting the use of said land as a refuse disposal site and facility;  
and still fails and refuses to so do.

15. That, unless enjoined by this court, defendant will continue to use,  
or permit the use of said lands as a refuse disposal site or facility, to the further  
irreparable damage of the plaintiff, for which they have no adequate remedy at law.

WHEREFORE, plaintiff prays that writ of temporary injunction may issue  
against defendant, to restrain defendant, agents and employees, and all persons  
acting or claiming by, for, through or under him from using, or permitting the use

refuse upon said land.

(a) That after trial hereof, said writ of temporary injunction may be  
made permanent;

(b) That plaintiff may have such other and further, or different, relief  
in the premises as the court shall deem equitable and proper; and

(c) For costs of suit.

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JOHN M. KARKS, JR.  
State's Attorney  
St. Clair County  
State of Illinois  
Attorney for Plaintiff